

## Remarks

5

### The rejections under 35 U.S.C. 101

#### *Claim 1 as amended*

10 Claim 1 as currently amended reads as follows:

1 1. (currently amended) A graphical user interface for specifying an action to be  
 2 performed on a field of a record stored in a memory device when a query with which the  
 3 action is associated returns the record, the query being executed on a processor that has  
 4 access to the memory device and interacts with the graphical user interface,  
 5 the graphical user interface comprising:  
 6 a window containing a table wherein the field of the record has an entry that is  
 7 selectable by the user, the entry including  
 8 a first field of the entry that identifies the field of the record to be acted on;  
 9 and  
 10 one or more action fields of the entry that, when the user has selected the  
 11 entry, the user may set to specify the action.

In making these rejections, Examiner states that

5 The language of this claim describes non-functional descriptive material.  
 As such, this raises a question as to whether the claim is directed merely to  
 an abstract idea that is not tied to a technological art, environment or  
 machine, which would result in a practical application producing a  
 concrete, useful and tangible result to form the basis of statutory subject  
 matter under 35 USC 101.

Applicant has amended claim 1 to specify

10 a field of a record stored in a memory device when a query with which the  
 action is associated returns the record, the query being executed on a  
 processor that has access to the memory device and interacts with the  
 graphical user interface

The amendment recites a data structure that is functional and is further stored in a computer readable medium. Support for the amendment can be found on page 5 of Applicant's application as filed in the section with the title, "Overview of the process control system in which the invention is embodied--FIG. 8". The amendment further  
5 recites what was implied in the un-amended claim and therefore does not affect the scope of the claim as originally filed.

Since claim 1 as amended now "particularly point[s] out and distinctly claim[s] the subject matter which applicant regards as his invention", so do dependant claims 2-19  
10 and the amendment of claim 1 has therefore overcome Examiner's rejection of claims 1-19 under 35 U.S.C. 112, second paragraph.

### **Drawings**

A copy of the amended drawings for this application is attached. Changes have been  
15 marked in red. Applicant is respectfully traversing the requirement under 37 C.F.R. 1.84(m) that shading be removed from FIGs. 9-17. FIGS. 9-17 are screen shots of a graphical user interface. The black areas indicate highlighted portions of the screen shots. As such, they represent color and are permitted by 37 C.F.R. 1.84's provision that  
20 "Solid black shading areas are not permitted, *except when use to represent . . . color.*" (emphasis added) A letter to the Chief Draftsperson accompanies this response.

### **Specification**

A replacement Specification is attached. The replacement Specification is double spaced and has been amended as required by Examiner and to correct typographical errors noted  
25 by Applicant. The amendments are marked in the replacement Specification.

### **Rejection of claims 1-19 under 35 U.S.C. 112, first paragraph**

In order for a claim to be rejected under 35 U.S.C. 112, first paragraph, the Specification as filed must lack a written description of the invention set forth in the rejected claims. In  
30 the present case, claims 1-19 may be rejected under 35 U.S.C. 112, first paragraph, only

if the disclosure of the invention in the application is not sufficient to permit any person skilled in the art to which the invention pertains to make and use the invention.

In his rejection, Examiner states “there is no enablement as to the format/structure of the data structure (the record of the preamble of claim 1 and the fields/subfields populating this record) that is at the core of this invention.”

Applicant’s claim 1 is directed to a graphical user interface for specifying an operation to be performed on a field of a record record. The preamble of the claim sets forth

A graphical user interface for specifying an action to be performed on a field of a record stored in a memory device when a query with which the action is associated returns the record, the query being executed on a processor that has access to the memory device and interacts with the graphical user interface.

The field of a “record” of the preamble is a PR record. The description of the PR record can be found at page 15, line 24, line 6 through page 18, line 3 of the Specification. The PR record (833) is shown in FIG. 8 and its relationship to other database tables of the system is shown in FIGs 6 and 7. The GUI of the preamble is shown in FIG. 13 and its relationship to the “record” (833) is further described at page 49 line 15:

An entry has two parts: the first part, 1303, is a field which identifies the field in the PR record which will be affected by the action. The second part 1306 is one or more fields that define the action to be taken on the field identified by field 1303. What fields are in 1306 and how they define the action depend on the kind of action, or put another way, on the type of the values which field 1303 may contain.

It should be immediately apparent that the descriptions of the embodiments at the cited locations fulfill the written description requirement of 35 U.S.C. 112, first paragraph, and that Examiner's rejection of claims 1-19 under 35 U.S.C 112, first paragraph is not sustainable.

**Rejection of claims 1-19 under 35 U.S.C. 112, second paragraph**

Examiner rejects claims 1-19 under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. As regards claims 1, Examiner states “multiple uses of the term ‘field’ is confusing, as ‘field’ refers to different entities within this claim”. Applicant has  
 5 amended claim 1 to further define each use of the term ‘field’ to include the entity to which the field belongs. Since claim 1 as amended is now addressed to patentable subject matter, so are dependant claims 2-19 and the amendment of claim 1 has therefore overcome Examiner’s rejection of claims 1-19.

10 Examiner further rejects claim 9-14 under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Examiner states the claim language of claim 9 “is convoluted. It is unclear what field value is affecting what other field value, whether a user is setting only action fields or action fields and a reference field operation value, and  
 15 whether “current” is before or after the user sets field value(s).”

*Claim 9 as amended*

Claim 9 as amended reads as follows:

9. (currently amended) The graphical user interface set forth in claim 1 wherein:

the user may set the action fields to specify a reference field which is another field in the record and a reference field operation by which a new value for the identified field may be computed from a current value of the reference field, the current value being the  
 5 value that the reference field has when the record is returned from the query.

In claim 9, the “reference field” is “another field in the record” and therefore different from the “identified field”, which is claim 1’s “field of the record” that is identified by the “first field of the entry” Applicant believes that when claim 9 is read in the context of claim 1, from which it is directly dependent, that its language is clear. Applicant has further amended claim 9 to make it

clear that the 'current value' is the value of the reference field as of the time the record is returned by a query. Since claim 9 as amended now "particularly point[s] out and distinctly claim[s] the subject matter which the applicant regards as his invention", so do dependant claims 10-14 and the amendment of claim 9 has therefore overcome Examiner's rejection of claims 9-14 under 35 U.S.C. 112, second paragraph..

### **Traversal of the rejections of claims 1-19 under 35 U.S.C. 103**

When rejecting a claim under 35 U.S.C. 103, Examiner has the burden of establishing a *prima facie* case for the rejection. As set forth at MPEP 2142, to establish the *prima facie* case, Examiner must show the following:

First, there must be some suggestion or motivation . . . to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations.

In the following, Applicants will set forth in detail why Examiner has failed to meet the third criterion and consequently has not established a *prima facie* case for his rejection of Applicants' claims 1-19.

#### *What Applicant discloses*

Applicant's system is a process control system that includes a database system. Each process is represented by a record in a process record database table in the database system. A process record (833) has fields that indicate the current state of the process represented by the record. Among these fields are fields that are defined by the user of the process control system. The process control system works by querying the process record database table for process records whose field values satisfy conditions indicated in the query. When a process record is part of a query result, an action is taken with regard to the process. One of the actions that can be taken is setting a field in the process record. The invention is, as set forth in the preamble of the claim,

A graphical user interface for specifying an action to be performed on a field of a record stored in a memory device when a query with which the action is associated

returns the record, the query being executed on a processor that has access to the memory device and interacts with the graphical user interface.

The graphical user interface of the preamble of claim 1 is shown in FIG. 13 and its relationship to the PR record (833) is further described at page 49 line 15. A copy of claim 1 as amended with reference numbers added to relate the claim to the preferred embodiment of FIGs. 8 and 13 follows:

1. (currently amended) A graphical user interface (1301) for specifying an action to be performed on a field of a record (833) stored in a memory device (809) when a query with which the action is associated returns the record (833), the query being executed on a processor (805) that has access to the memory device (809) and interacts with the graphical user interface.(1301)

the graphical user interface comprising:

a window containing a table (1303) wherein the field of the record (833) has an entry that is selectable by the user (1302), the entry including

a first field of the entry (1303) that identifies the field of the record (833) to be acted on; and

one or more action fields of the entry (1306) that, when the user has selected the entry(1307), the user may set to specify the action (1309).

*What Texier discloses*

In making his rejections under 35 U.S.C. 103, Examiner combines Texier with Schultz. The abstract of the Texier patent provides an overview of what the patent discloses:

A method of creating data entry forms provides for the display of dialogue-windows on a computer system screen operating in a multi-window graphic mode. The windows are displayed by organizing the windows into one or more pages, each of which can be materialized by one screen window. In each page, at least one active zone, page or part of a page is defined which can react to an external event such as an operator initiated input. The active zone is then associated with a set of "editor" functions, wherein at least one reaction function of the active zone is responsive to activation by an external event or input.

As set forth in the above *Abstract*, what Texier discloses is a GUI for defining elements of a window, not a GUI like Applicant's, which, as set forth in Applicant's claim 1, "specif[ies] an action to be performed on a field of a record stored in a memory device when a query with which the action is associated returns the record, the query being executed on a processor that has access to the memory device and interacts with the graphical user interface".

Given the differences in the purposes of the two GUIs, one would not expect Texier's GUI to disclose any limitations of claim 1 beyond those which are common to GUIs generally. That this in fact the case can be seen by comparing Applicant's FIG. 13 with Texier's FIGs. 1 - 3. As one would expect from its purpose, the GUI of Applicant's FIG. 13 has an entry 1302 for each user-defined field in the record; in entry 1302, field 1303 specifies the name of the user-defined field upon which an action will be performed when the record is returned by a query. A list of possible actions to be performed on the field of a record is shown at 1307 and the specific action shown at 1309.

Texier's FIG. 1 shows a window that has been defined using Texier's GUI. The window in question is used to input employee information to a database, as indicated at "SELECT AN OPERATION". The database operation to be performed is indicated at BASE FILE; at EMPLOYEE INFORMATION is shown the part of the window into which the employee information is to be entered. See Texier, col. 6, lines 5-23 The window of FIG. 1 is thus simply a GUI for directly setting fields in database records, not a GUI for specifying how a named field of a record will be set when the record is returned by a query. Texier's FIG. 2, described at col. 17, line 13-col. 18, line 14, shows Texier's GUI for creating the elements of a window. Texier's FIG 3, described at col. 18. lines 30-60, shows the GUI used in Texier to define the behavior of an object in a window created using the GUI of FIG. 2. These GUIs are thus GUIs for manipulating windows and thus also not a GUI for specifying how a named field of a record will be set when the record is returned by a query. As one would expect from the difference between their purposes and the purpose of Applicant's GUI, none of these GUIs looks anything like the GUI of FIG. 13 and none of them discloses any of the limitations of claim 1.

#### *What Schultz discloses*

The abstract of the Schultz patent provides an overview of what the patent discloses:

An industrial controller executing a graphical language employs a comparator circuit for monitoring the address locations of memory used to store the control program and its data. A cursor positioned on a graphics representation of the program is used to identify a particular graphical element to be monitored and the address of the starting instruction for that element is loaded into the comparator. An interrupt generated by the comparator causes the generation of a histogram listing the particular rungs name

and the times at which it has been executed, useful for verifying and monitoring the operation of a control program. A snapshot of data values used by the element of the program at the time of its execution may also be stored to verify the condition under which the element executes.

5 The lack of any relationship whatever between Schultz's disclosure and what Applicant is claiming becomes immediately apparent when one considers what is meant by the terms "industrial controller" and "control program". As shown in FIG. 1 and described at Schultz col. 4, line 45 - col. 5, line 15, controller 10 controls equipment used to perform an industrial operation. In the  
10 example of FIG. 1, controller 10 controls an operation in which containers 40 moving on conveyor 38 are filled with the contents of tank 24. Controller 10 controls the operation of the conveyor belt and the operation of tank 24, which includes controlling operation of a heater 30, a valve 26, and an agitator 28. Controller 10 is itself controlled by a control program, and what Schultz's disclosure concerns is an interface for monitoring the operation of the control program. Again, one would not  
15 expect the GUI for Schultz's interface for monitoring the operation of the control program for an industrial controller to bear any resemblance whatever with Applicant's GUI

for specifying an action to be performed on a field of a record . . . when a query with which the action is associated returns the record . . .

20 In his rejections of the claims, Examiner finds limitations of Applicant's claims in Schultz's FIG. 5. The problem with this is that FIG. 5 does not disclose a GUI. FIG. 5 is explained at col. 7, lines 37-54:

25 Referring now to FIGS. 1 and 5, data defining each task 80 may be entered by the programmer through the programming terminal 19, or other terminal such as a microprocessor based computer, based on the programmer's knowledge of the overall operation of the controlled equipment 22 and the particular tasks and their criticality. This data is received by a task scheduling table 88 and used by the task control blocks 85.

30 As represented schematically, the task scheduling table 88 includes columns indicating a task name, a task priority, a task scheduling type, the task trigger condition, the programs 82 associated with the task, and a watchdog time value. The significance of the data entered into each of these columns may be explained by reference to example tasks forming the rows of the task scheduling table 88 and used  
35 to control the equipment 22 of FIG. 1.



Table 88 is not a GUI, but a schematic representation, and the total disclosure in Schultz of the interface used to input the values contained in table 88 is “data defining each task 80 may be entered by the programmer through the programming terminal 19 or other terminal such as a microprocessor based computer” (lines 37-41).

5

The GUI for Shultz’s monitoring interface is shown in FIGs. 11 and 15 and described beginning at col.15, line 37 of Schulz. As explained there, the GUI for Schultz’s monitoring interface represents the control program as a relay ladder diagram of interconnected contacts and coils (col. 17, lines 14-19). To monitor a portion of the control program, the user moves magnifying glass cursor 330  
 10 to the rung in the relay ladder diagram that represents the portion of the program the user wishes to monitor. When the user indicates selection of the rung by hitting a key of the terminal the GUI is being displayed on, the monitoring of the selected rung begins (col. 17, lines 20-29). The results of the monitoring are displayed in subwindow 342 (col. 18, lines 6-18 or in the version of subwindow 342 shown in FIG. 15 (col. 18, lines 19-29). The GUI of FIG. 11 differs fundamentally from  
 15 Applicant’s GUI in that it is *read only*. It can be used to see how the control program is working, but it cannot be used to “specif[y] an action to be performed on a field of a record . . .when a query with which the action is associated returns the record.”

Like Texier, Shultz discloses none of the limitations of Applicant’s GUI as claimed. FIG. 5 does  
 20 not disclose a GUI at all and the GUI of FIG. 11 has a purpose which is completely different from that of Applicant’s GUI, and as would be expected from that fact, discloses none of the limitations of Applicant’s GUI as claimed. Since neither Texier nor Schultz discloses any of the limitations of Applicant’s GUI as claimed, Examiner has not made his *prima facie* case and his rejection of Applicant’s claims under 35 U.S.C. 103 as obvious over the combination of Texier and Schultz is  
 25 without foundation.

*Detailed discussion of Examiner’s rejection of the claims*

Claim 1

30

The GUI of Texier's FIG. 1 shows a GUI built by the method of the Texier invention which is used to input data to a field of a record, not a GUI for specifying an operation to be performed on a field of a record when the record is returned by a query

5 Examiner also cites FIG. 5 of Schultz disclosing *one or more action fields that, when the user has selected the entry, the user may set to specify the action*. FIG. 5 does not disclose a graphical user interface at all. Because the references do not show all of the limitations of claim 1, Examiner has not established his *prima facie* case with regard to that claim and claim 1 is patentable over the references, as are claims 2-19 dependent from claim 1. Additionally, however, these claims add  
10 limitations which are not disclosed in the references and are consequently patentable in their own rights over the references.

In his rejections of claims 2-3, 5-10, 13-15, Examiner finds at least some of the added limitations in Schultz's FIG. 5. As set forth above, FIG. 5 does not disclose a GUI at all, and consequently,  
15 claims 2-3, 5-10, and 13-15 are patentable in their own rights over the references.

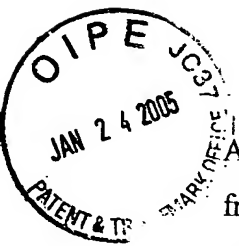
#### Claim 4

In his rejection of claim 4, Examiner cites Texier, FIG. 1 "Base File" as disclosing: *the user may set  
20 the action fields to specify that the identified field be cleared*. The reference does not disclose fields being cleared when a record is returned by a query, but a field being cleared in a GUI, and consequently, claim 4 is patentable in its own right over the references.

#### Claim 11

In his rejection of claim 11, Examiner cites Texier, FIG. 1 "Base File" as disclosing: *the reference  
field operation assigns the current value of the reference field to the identified field*. The reference  
shows that fields within the window can have data inputted and edited, which is the object of the  
30 Texier invention. This reference does not disclose a field of a record that will have an action performed on it some time in the future when the record is returned by a query.

In his rejection of claim 16, Examiner cites Texier FIG. 1, as disclosing *the user may set the action fields to specify a role reference field from which a new person value for the identified field may be obtained, the role reference field referring to an ordered set of person values wherein one of the person values is a last-used person value and the role reference field obtaining the next person value following the last-used person value at the time the record is returned as the new person value for the identified field.* FIG. 1 shows fields within the window into which data may be data input and the input data edited, which is the object of the Texier invention. The GUI of FIG. 1 does not set any kind of action fields, let alone action fields which may be set “to specify a role reference field from which a new person value for the identified field may be obtained”, as claimed. Claim 16 is consequently patentable in its own right over the references, as are claims 17-19, which add further details concerning setting the action fields.



As regards the "black shading" in FIGs. 9 -17, these figures are screen shots of windows from graphical user interfaces. The black shading indicates highlighted parts of the screen shots. Applicant's attorney has been using screen shots like these to show user interfaces for more than 10 years without objection, and Applicant's attorney believes the practice is sanctioned by 37 C.F.R . 1.84's provision that "Solid black shading areas are not permitted, *except when use to represent . . . color.*" (emphasis added)

Respectfully submitted,

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Date

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(Date)

Gordon E. Nelson, #30,093

Gordon E. Nelson  
(Signature)



[illegible]

**Schedule Details - Monday Friday Every Two Hours DB: TRWISE**

Admin Schedule: Monday Friday Every Two Hours

**Schedule Details:**

Day	Start Time	End Time	Time Interval
Sunday			
Monday	8:00 AM	5:00 PM	120
Tuesday	8:00 AM	5:00 PM	120
Wednesday	8:00 AM	5:00 PM	120
Thursday	8:00 AM	5:00 PM	120
Friday	8:00 AM	5:00 PM	120
Saturday			

Buttons: ? Help, Exit, Clear, Copy to All, Edit

FIG. 11



Administration of Setting Selection Values

Admin Activity: Set Priority to Emergency

Set values, sorted by: Field Name (Asc)

Field Name to Set	Field Type	Operation	Set Values
Additional Samples Tested?	Selection		
Affected SOP	Selection		
Assessment Method	Selection		
Assignable Cause	Multi-Selection		
Condition	Selection		
Disposition of Samples	Selection		
Final Disposition	Selection		
Governing SOP	Selection		
Impact	Selection		
Location	Selection		
Mfg Stage	Selection		
Phase	Selection		
Priority	Selection	Set	Emergency
Product Family	Selection		
Product(s)	Multi-Selection		
Proposed Disposition	Selection		
Type	Selection		

1302

1303

1305

1307

1309

1301

1306

Help

Exit

Save

Cancel

Mfg Stage	Selection		
Phase	Selection		
Priority	Selection	Set	Emergency
Product Family	Selection		
Product(s)	Multi-Selection	Increment Set	1311
Proposed Disposition	Selection	Clear	
Type	Selection		

1310

Selection Values DB: TRWISE

Emergency

Low

Normal

1313

Help

Ok

Cancel

FIG 13



Administration of Setting Date Values

Admin Activity: Assigned To Notification

1402

Field to Set	If Field is Blank, Base Field to Use	+/- Add Value	Time Units	If Field Already Set, Base Field to Use	+/- Add Value	Time Units	Business Days Rule
Analyst Approval On							
Audit Start Date							
Closed On							
Date Due							
Date Occurred							
Director Approval On							
Discovery Date							
Next Audit Date							
QA Approval On							
Received Questionnaire							
Response Due Date							
Sent Questionnaire							
Supervisor Approved On							

1403 1405 1411 1412

1401 1407 1409 1413

1415

Field to Set	If Field is Blank, Base Field to Use	+/- Add Value	Time Units	If Field Already Set, Base Field to Use	+/- Add Value	Time Units	Business Days Rule
Analyst Approval On							
✓ Audit Start Date	Date Created						
Closed On	Date Created						
Date Due	Date Due						
Date Occurred	Date Occurred						
Director Approval On	Director Approval On						
Discovery Date	Discovery Date						
Next Audit Date	Next Audit Date						
QA Approval On	QA Approval On						
Received Questionnaire	Received Questionnaire						

1414 1417

1419

Field to Set	If Field is Blank, Base Field to Use	+/- Add Value	Time Units	If Field Already Set, Base Field to Use	+/- Add Value	Time Units	Business Days Rule
Closed On							
✓ Date Due	Date Created	30					
Date Occurred							

1418 1421

1424

Field to Set	If Field is Blank, Base Field to Use	+/- Add Value	Time Units	If Field Already Set, Base Field to Use	+/- Add Value	Time Units	Business Days Rule
Closed On							
✓ Date Due	Date Created	30	Day(s)				Calendar
Date Occurred							
Director Approval On							
Discovery Date							
Next Audit Date							

1422 1423 1425

FIG. 14

1501

Administration: Setting Person Fields

Admin Activity: Set Assigned To

Field to Set	If Field is Blank, Person to Set	If Field is Blank, Person Role to Set	If Field Already Set, Person to Set	If Field Already Set, Person Role to Set
2nd Auditor				
Analyst Approval By				
Assigned To		Customer Support		
Closed By		Customer Support		
Contact		Developer		
Director Approval By		Project Leader		
Originator		Project Manager		
Person Notified		Quality Manager		

1513

1503

1505

1507

1509

1511

1515

Help

Edit

Save

Cancel

1517

Administration of Setting Person Fields

Admin Activity: Set Assigned To

Field to Set	If Field is Blank, Person to Set	If Field is Blank, Person Role to Set	If Field Already Set, Person to Set	If Field Already Set, Person Role to Set
2nd Auditor				
Analyst Approval By				
Assigned To			Benson, Harry	
Closed By				
Contact				

Help

Edit

FIG. 15

Administration of Posting Activities

Admin Activity: Post Begin Audit Activity

Activity to Post	Posting Mode	Date Reference Field	+/- Value	Time Units	Business Days Rule	Responsible by Function	Responsible by Name
Action Item(s) Complete							
All Responses Received							
*Analyst Approval							
*Approve Corrective Action							
*Approve Preventative Action							
✓ Begin Audit	Perform						
Begin Change Control	Schedule						
Begin Investigation	Perform						
*Change Control Cancelled							
Change Request							
*Close							
*Close - Deter							
*Close - Reject							
Comments							
Commitment Initiated							
Complete							
Complete Commitment							
Complete Correspondence							

Note: \*Color-coded Activity Types Require Electronic Signature and can therefore be posted as Scheduled only.

1601

1602

1603

1605

1609

1611

1604

1607

Help

Exit

Save

Cancel

Administration of Posting Activities

Admin Activity: Post Begin Audit Activity

Activity to Post	Posting Mode	Date Reference Field	+/- Value	Time Units	Business Days Rule	Responsible by Function	Responsible by Name
Action Item(s) Complete							
All Responses Received							
*Analyst Approval							
*Approve Corrective Action							
*Approve Preventative Action							
✓ Begin Audit	Schedule	Current Date/Time	2	Day(s)	Calendar	Post	
Begin Change Control							
Begin Investigation							
*Change Control Cancelled							
Change Request							
*Close							
*Close - Deter							
*Close - Reject							
Comments							
Commitment Initiated							
Complete							
Complete Commitment							
Complete Correspondence							

Note: \*Color-coded Activity Types Require Electronic Signature and can therefore be posted as Scheduled only.

1613

1614

1615

Help

Exit

Save

Cancel

FIG. 16

